

IN THE NAME AND BY AUTHORITY OF THE STATE OF TEXAS

THE STATE OF TEXAS  
COUNTY OF HIDALGO

IN THE JUSTICE COURT  
PCT. 5 PL. 1

Before Me, the undersigned authority, this day personally appeared INVESTIGATOR LUCIO TORRES III #5012 for The State of Texas, who after being sworn, upon oath deposes and says that he has good reason to believe and does believe and charge that one JOSE ALFREDO CHAVEZ (DOB [REDACTED]) on or about May 6, 2019 and before the making of this complaint, in Hidalgo County, and State of Texas did then and there unlawfully and willfully commit the offense of ENGAGING IN ORGANIZED CRIMINAL ACTIVITY TPC 71.02 [73991005] F1.

TO-WIT: JOSE ALFREDO CHAVEZ (DOB [REDACTED]) then and there, with the intent to establish, maintain, or participate in a combination or in the profits of a combination, the combination consisting of the defendant and Enrique Aguirre Jr., Luis Angel Jimenez, Marco Antonio Elizondo, Oved Alejandro Ponce, Jorge Elias Martinez, and Rocio Hernandez Barajas who collaborated in carrying on the hereinafter described criminal activity, conspire to commit the offense of Aggravated Kidnapping by agreeing with each other that they would engage in conduct that constituted the offense, and the defendant and Enrique Aguirre Jr., Luis Angel Jimenez, Marco Antonio Elizondo, Oved Alejandro Ponce, Jorge Elias Martinez, and Rocio Hernandez Barajas performed an overt act in pursuance of the agreement, namely kidnap [REDACTED] and [REDACTED] at gunpoint and hold them against their will.

PROBABLE CAUSE: On Monday, May 6, 2019, at 11:21 PM, Hidalgo County Sheriff's Deputies responded to the area south of 2 Mile Line on Farm to Market Road 492, [REDACTED] in regards to an aggravated kidnapping that occurred in the area, north of 5 Mile Line on La Homa Road, [REDACTED] in rural Mission, Hidalgo County, Texas.

Sheriff's Deputies made contact with the reporting party who stated that two individuals, [REDACTED] and [REDACTED], were taken at gunpoint from the residence on Janice Street. Several armed men with handguns and rifles arrived in three separate vehicles and forced them into the vehicles taking them by force. Sheriff's Investigators were able to obtain witness and victim statements regarding the incident.

Sheriff's Investigators interviewed Luis Angel Jimenez who provided a voluntary statement of accused and admitted to being in contact with Enrique Aguirre, who through photo line ups was identified by two other co-defendants as being the leader of the kidnappers. Luis also admitted to being in contact with Enrique before and after the kidnapping.

Investigators identified another suspect and questioned him regarding the incident and he admitted to the offense and implicated several individuals to include: Enrique Aguirre Jr., Luis Angel Jimenez, Victor Luna, Jose Alfredo Chavez, Marco Antonio Elizondo, Oved Alejandro Ponce, and two male juveniles that committed the offense of Aggravated Kidnapping to include Rocio Hernandez Barajas who provided the weapons for the offense. The suspect further provided locations on [REDACTED] Drive in the city of Palmview, Hidalgo County, Texas where the victims were taken to for questioning and beat and [REDACTED] Avenue in the city of San Juan, Hidalgo County, Texas, where the weapons and body armor were kept. The suspect also stated that one of the other suspects accidentally shot the ceiling with a gun at the residence on [REDACTED] and identified the owner of that house to be "Chivo" who he identified to be Jose Alfredo Chavez. Through law enforcement records, Investigators were able to show that Jose Alfredo Chavez resides at [REDACTED] Drive.

Sheriff's Investigators located the residence on [REDACTED] and [REDACTED] and executed search warrants at the residences, recovering several bullet proof vest carriers, ballistic helmets, rifle magazines, masks, and a bullet hole at the residences. During one of the search warrants, Investigators made contact with a witness and neighbor at [REDACTED] who stated that she heard a gunshot come from [REDACTED] Drive on the night of the kidnapping and that [REDACTED]

Sheriff's Investigators reviewed victim, witness, suspect statements, and physical evidence recovered during a search warrant, which demonstrate sufficient probable cause to show that JOSE ALFREDO CHAVEZ (DOB [REDACTED]) committed the offense ENGAGING IN ORGANIZED CRIMINAL ACTIVITY TPC 71.02 [73991005] F1.

Contrary to the statutes in such cases made and provided, and against the peace and dignity of the State of Texas.

Sworn and subscribed before me, this 15<sup>th</sup> day of May, 20 19 A.D.

File: W-19-0228-551  
Supervisor Approval [Signature]  
Case Number: 19-16732

Affiant

